

May 21, 2010

Federal Communications Commission
445 12th Street, SW
Room TW-A325
Washington, DC 20554

RE: CG Docket No. 02-278

This is in response to your office's call for comment on proposed revisions to the Federal Communications Commission's (FCC's) rules under the Telephone Consumer Protection Act (TCPA) contained in the Notice of Proposed Rulemaking published in the Federal Register on March 21, 2010 (the "NPRM") (CG Docket No. 02-278).

This letter is submitted by the National Council of Higher Education Loan Programs (NCHELP) and the Education Finance Council (EFC). NCHELP is a trade association whose members include lenders, including banks and nonprofit organizations, guaranty agencies, secondary markets, loan servicers and collection agencies. EFC is the trade association representing nonprofit and state-based student loan providers. Members of NCHELP and EFC participate in education loan programs, including the federally sponsored student loan programs and private educational loan programs. These programs enable individuals to attain the postsecondary education needed to succeed. The ability of our country to compete in the world marketplace depends on having an educated citizenry.

According to the NPRM, the purposes of the NPRM are to harmonize rules under the Telephone Consumer Protection Act with those under the Federal Trade Commission's (FTC's) Telemarketing Sales Rule (TSR) with respect to prerecorded telemarketing calls by removing differences in treatment of entities that operate outside of the FCC's jurisdiction¹, and to empower residential telephone subscribers to avoid telephone solicitations to which they object².

With that background, the FCC proposes, among other things, to require telephone subscribers' express written consent to receive prerecorded telemarketing messages, whether sent to cellular phones or to residential phone lines³, and to eliminate the established business relationship exception to the consent requirement for telemarketing messages to residential telephone lines.⁴ In the NPRM, the FCC also seeks comment on its tentative conclusion that the express written consent requirement should also apply to automated or artificial or prerecorded message calls to

¹ FCC 10-18, para. 1 and 2. The FCC notes that, while most entities using prerecorded telemarketing calls must comply with the more restrictive FTC standards, some, such as common carriers, banks and insurance companies, are subject only to the FCC's rules. Id.

² Id., para. 2. Again, looking to conform its rules to those of the FTC, the FCC notes that an established business relationship exception doesn't exist under the TSR for prerecorded telemarketing because the FTC found that consumers object to those telemarketing messages. Id. at para. 25-29.

³ Id., para. 16.

⁴ Id., para. 28.

cellular phones and prerecorded message calls to residential phone lines.⁵ While we recognize that, in footnotes to the NPRM, the FCC states that as a practical matter the proposed written consent requirement only applies to sellers and telemarketers⁶ and that the NPRM does not change the FCC's current rules on prerecorded message calls that do not include a solicitation,⁷ the language of the proposed rule and the preamble discussion are not limited to telemarketing and so will create inconsistency with the TSR and have severe implications on the integrity of the student loan programs and adverse consequences for consumer borrowers⁸.

Historically, the FCC and the FTC have declined to apply the TCPA and TSR restriction to calls made by creditors, servicers and collectors in performance of their normal activities in servicing loans and attempting to collect defaulted loans. For example, the FTC determined that debt collection calls are not telemarketing (unless the call also includes an "upsell") and are not covered by the TSR.⁹ In 2008, the FTC revised its Telemarketing Sales Rule to prohibit a seller or telemarketer from initiating an outbound telephone call that delivers a prerecorded telemarketing message unless the caller had previously obtained the recipient's signed written agreement to receive such calls.¹⁰ However, this action by the FTC should not be viewed as a rationale to apply the restrictions to creditors, servicers and collectors in performing their established roles in servicing and collecting existing loans because the FTC's rule does not apply to these activities.

The FCC also has made it clear ever since 1992 that calls made by creditors, servicers and collectors are exempt from its TCPA rule. Most recently, in a Declaratory Ruling adopted December 28, 2007 in response to the request of ACA International, the FCC ruled that (i) calls regarding debt collection or to recover payments are not telephone solicitations and are not subject to the TCPA's restrictions on telephone solicitations; and (ii) creditors and debt collectors may use predictive dialers to call wireless phones as long as the wireless phone number was provided by the subscriber in connection with the existing debt.¹¹ This rule followed the FCC's initial rule implementing the TCPA, which concluded that an express exemption for debt collection calls to residences was unnecessary as such calls fall within the exemptions adopted for commercial calls which do not transmit an unsolicited advertisement and for established business relationships¹², and the 1995 Memorandum Opinion and Order addressing petitions for reconsideration of the 1992 TCPA Order, which clarified that prerecorded debt collection calls are exempted from the prohibition on prerecorded or artificial voice messages to residences.¹³ The 1992 TCPA Order is based, at least in part, on the determination that persons who knowingly release their phone numbers have in effect given their invitation or permission to

⁵ Id., para. 20.

⁶ Id., fn. 53.

⁷ Id., fn. 81.

⁸ Our concern also stems from the fact that, while in footnote 81 the FCC states that it is not addressing the commercial/non-solicitation exception to residential phone consent requirements, the statutory predicate for both this and the established business relationship exception is a lack of adverse affect on privacy rights. See 47 USC 227(b)(2)(B)(ii)(I).

⁹ See Telemarketing Sales Rule, 68 Fed. Reg. 4580, 4664 (January 29, 2003); see also FCC 05-28 Second Order on Reconsideration, fn. 111 (February 10, 2005).

¹⁰ 2008 Final Rule Amendments, 73 Fed. Reg. 51164 (August 29, 2008).

¹¹ FCC 07-232 (December 28, 2007).

¹² 1992 TCPA Order, 7 FCC Rcd at 8773, para. 39

¹³ 1995 TCPA Reconsideration Order, 10 FCC Rcd at 12400, para. 39.

be called at the number which they have given, absent instructions to the contrary.”¹⁴ The 2007 Declaratory Ruling affirms that determination.¹⁵ We find this rationale to still be compelling.

Therefore, absent clear regulatory language that loan servicing and debt collection activity are not subject to the proposed changes set forth in the NPRM, the proposed revisions will not harmonize the FCC’s with the FTC’s regulations but rather will mean that the activities of creditors, servicers and their debt collection agencies falling within the FTC’s jurisdiction will not be subject to the TSR but will be encompassed within a different set of more restrictive FCC rules.

Protecting consumers from invasive and aggressive telemarketing calls is important. However, we strongly believe that the imposition of telemarketer restrictions on student loan providers and their servicers and collectors would have serious consequences that will result in additional student loan defaults and reduced default recoveries, limiting the already scarce resources necessary to help Americans pursue a higher education. It would also have unintended harmful consequences on borrowers, tens of thousands of whom will needlessly default on their student loans because they could not be efficiently contacted about their loan status and counseled on the many repayment options available to them. Because well over 80% of outstanding student loans have been made under federally sponsored loan programs where the federal government ultimately bears all or substantially all the default risk, any such restriction will cost federal taxpayers billions of dollars.

The federally-sponsored student loan programs administered by the U.S. Department of Education include the Federal Family Education Loan Program (FFELP), the William D. Ford Federal Direct Loan Program and Federal Perkins Loan Program. The outstanding balance on FFELP and Direct Loans is over \$636 billion, of which \$487 billion is made under the Federal Family Education Loan Program. Over \$100 billion in new federal student loans will be made for the 2009-2010 academic year. Normal servicing activity calls for telephone contact with borrowers who are overdue in their payments on a regular basis. The purpose is to remind them of their obligations and to educate them as to the various options available for meeting them. In FFY 2008, over \$60 billion in defaults on FFELP loans were averted through these efforts of the nation’s student loan guarantors, lenders, servicers and agencies. Similar rules requiring phone contact apply to the Direct Loan Program and the Perkins Loan Program, and similar servicing practices are followed for private education loans.

The federal programs have a variety of tools, including an attractive income based repayment plan and deferments and forbearance, to help borrowers who are experiencing difficulty in repaying their student loans. By taking advantage of these plans, borrowers can avoid default and its negative consequences. However, they have to be aware of the offerings to do so; if creditors, servicers, guarantors and their agencies cannot use consumer-preferred means of communications (more fully discussed below), these reminders and information never get to the consumer. Few borrowers take the initiative; most need to be prompted. The most efficient way to do this is through telephone contact. Both predictive dialers and prerecorded messages are used to improve the efficiency of these activities.

¹⁴ 1992 TCPA Order, 7 FCC Rcd at 8769, para. 31.

¹⁵ FCC 07-232, p. 6 (December 28, 2007).

Reaching borrowers by telephone during the delinquency period is critically important. According to information provided by the U.S. Department of Education, in 2008 over 95 percent of defaulted borrowers had not been contacted by telephone during the 360 days leading up to default.¹⁶ The Department's information also reveals that if its loan servicer can reach a delinquent borrower by telephone, it can resolve the delinquency 98 percent of the time.

Despite best efforts, some federal student loans do go into default. In these cases, guaranty agencies (for FFELP loans) and the Department of Education (for Direct Loans) must attempt to collect the loans on behalf of the federal taxpayer. Federal requirements mandate how these activities are conducted and, as with delinquency processing, specifically require telephone contact. These activities are commonly outsourced to private collection agencies. One of the tools available to help borrowers is loan rehabilitation, under which a defaulted borrower who makes nine monthly payments over a period of ten months can wipe out the default record and be considered in good standing. This option often requires multiple telephone contacts to assist the borrower in staying on track and making timely payments for the required number of months. In FFY 2009, the Department of Education and the FFELP guaranty agencies collected over \$8.8 billion on defaulted loans, over \$3.5 billion of which was through loan rehabilitation. The recovery of defaulted private education loans also relies on telephone contact.

Since passage of the TCPA, various communication technologies have been developed and have come into common use, including cell phones, automated messaging, caller ID/ANI and predictive dialers. The use of cellular telephones has increased dramatically, and today one of every four American homes (24.5%) has only wireless telephones, according to the Center for Disease Control's (CDC) most recent report. In addition, the CDC reports that an additional fifteen percent have landlines but receive virtually all of their calls on wireless phones. The statistics for college students (aged 18-24) and recent graduates (aged 25-29) are even more dramatic. Nearly half of adults aged 25-29 years (48.6%) live in households with only wireless telephones and more than one-third of adults aged 18-24 (37.8%) live in households with only wireless telephones.¹⁷

Another significant technological change has been the universal use of caller ID and voice mail both in the cellular sector, and their prevalence in the landline sector. Using these features, debtors commonly decline to answer calls from other than people they know, with the caller then leaving a message. The most efficient means of contacting these borrowers is to leave an automated or prerecorded message. An advantage of using a prerecorded message is that the message content can be reviewed in advance to assure legal compliance.

We do not take lightly the importance of taking privacy interests into consideration. However, privacy should not be the sole consideration. There needs to be a balancing of interests that includes the integrity of our credit system and other, non-privacy, interests of borrowers.

¹⁶ Slide #31, Powerpoint #5, 2009 Federal Student Aid Conference (<http://ifap.ed.gov/presentations/2009FSACConference.html>).

¹⁷ Wireless Substitution: Early Release of Estimates From the National Health Interview Survey, July-December 2009; National Center for Health Statistics (May 12, 2010).

A functioning credit system depends on borrowers repaying their loans. Borrowers in many cases need to be reminded of their obligations. In fact, any reasonable borrower will expect this; when he or she accepts the loan, there's an understanding that he or she will be called if a required payment is not made. To prohibit this contact unless the borrower has authorized the contact in writing raises an almost insurmountable barrier to successful loan servicing and collection. In the NPRM, the FCC proposes to adopt a FTC provision, applicable to telemarketing, under which consent cannot be obtained as a loan requirement. While we do not take issue with the application of this approach to telemarketing, we believe the approach is counterproductive if applied more generally to normal servicing. There is no reason for the borrower to agree to provide the authorization, particularly when the authorization is sought at a time when the borrower is not having difficulty making payments (e.g. when the borrower is in school and no payments are required). The availability of an electronic authorization also is not realistic, as the conditions to obtaining consent to the use of electronic signatures under the E-Sign Act are probably even more problematic. We strongly believe, as the FCC has previously ruled, that, by providing telephone contact information to a creditor or its agent at any time during a loan's life cycle, a borrower is consenting to being contacted through that telephone.

To deny a creditor the most effective means to remind the borrower of his or her repayment obligation, and to provide information about rights and options, increases the dysfunction of the credit system and ultimately will increase the cost of credit to all borrowers because of increased operational costs and increased loss experience. It also should be pointed out that with voice messaging the debtor has total control over when he or she decides to listen to a message.

It should be recognized that it's not only the creditor that benefits, the value of communication to the debtor is also significant. Early delinquency contacts commonly are designed to assure the understanding of the borrower's debt obligations and of available repayment plans and deferment and forbearance options. The availability of income-based-repayment plans in the federal student loan programs, under which many borrowers are not required to even make a payment, is just one example of how creditors and their servicers can help borrowers, if given the opportunity. The value of these contacts is especially critical in the student loan context, since repayment ordinarily does not begin until the borrower leaves school, which is commonly years after the loan documents are signed and funds are disbursed.

Even after default, there is much that can be done to assist the borrower, particularly in the federally sponsored loan programs. The opportunity for loan rehabilitation is just one example. In short, borrowers will be harmed if student loan providers cannot communicate with them in the manner they prefer. Also, if these contacts cannot be made, it's more likely that the first point of contact a borrower will have will be a legal process (e.g. wage garnishment or litigation). All parties have an interest in attempting to resolve problems long before this occurs.

The attached documents, redacted for privacy, are just a small sample of those received by guaranty agencies and their collection vendors from distressed borrowers who benefited from the counseling received by their student loan providers. The letters show how, through telephone contact, the borrowers were able to obtain the information they needed to get back in repayment or on a path toward loan rehabilitation. The unintended consequences of not being able to reach

these borrowers through their telephones would be dire to both the borrowers and the Federal taxpayer.

For all the reasons set forth herein, we request that the final rule make clear that the FCC's is not changing its long standing interpretations that calls made by student loan providers and their servicers and collectors (i) to a residential telephone line using an artificial or prerecorded voice, and (ii) to a cellular phone using an automatic telephone dialing system or an artificial or prerecorded voice, even in the absence of prior written consent, are not prohibited by the rule. This clarification could be accomplished in at least two ways. First, the FCC could make clear that the final rule only applies to telemarketing calls. By taking this action, the FCC would be achieving its stated goal of harmonizing the FCC's rule with the FTC's rule. In the alternative, we request that the final rule make the clarification by explicitly stating that the rule, with its requirement that the debtor's consent be in writing, does not apply to creditors, servicers and collectors in performance of servicing and collecting loans. Such a statement would reflect long standing policy. However, the ambiguity in the NPRM, together with the complexity of the overall regulatory structure, has led us to the view that a clear statement of policy is needed. The exemption could be based on the reasonable and long standing interpretation that the debtor, by providing contact information, has given permission to receiving these calls.

If you have any questions, please do not hesitate to contact us. Our contact information is set forth below.

Sincerely,

Education Finance Council
National Council of Higher Education Loan Programs

EFC: Peter Warren, President (202-955-5510; peterw@efc.org)
NCHELP: Brett Lief, President, President (202-822-2106; blief@nchelp.org)

Attachment – Borrower Letters

May 14, 2009

Dear [REDACTED],

On March 10th, 2009 I received a phone call from an unknown number. I usually do not answer calls that I am not familiar with. But this particular time I decided to answer and I am not sure why. However, I am very happy that I not only answered, but was lucky enough to be greeted by Ms. [REDACTED] on the other end. Her warm voice could not have been the voice of a "debt collector". The warm, caring, helpful tone in her voice prompted me to listen, instead of hanging up. When I learned she was representing the Department of Education. I can honestly say for the first time in years that I was relieved. Usually I wanted to avoid facing my student loan debt, but Ms. [REDACTED] call inspired me and gave me hope. She optimistically educated me about a program that would relieve my credit report of the daunting debt, as well as enable me to continue my education at the University level.

It was ironic that we were discussing this program because the Summer of 2008, I initiated communication with the Department of Education regarding enrollment in this very program. I was greeted by a representative who told me I would need to make a down payment of \$5000 that day and agree to \$500 per month to enroll. I explained that I did not have access to five thousand dollars and was told that the best offer they could make was to lower the down payment to \$2000. I had recently lost my job and was only making a dollar above minimum wage. So the down payment seemed overwhelming and quite discouraging. Needless to say, I opted to not enroll at that time. Thank Goodness!

JUL 1 2009

My point is Ms. [REDACTED] has been the only representative of many from the Department of Education to inspire me to agree to and CARE about repaying my Student Loan. In just a couple of months, she has been dedicated to helping me by being understanding, flexible, and willing to "work with me". She has that magical thing that many "debt collectors" seem to lack. "A WARM CARING HEART" She doesn't treat me as a number or \$\$\$'s, but as a human being. I am writing this letter to say THANK YOU, to Ms. [REDACTED], and to [REDACTED] for hiring someone who cares about those she represents. Because of Ms. [REDACTED]' call, I was motivated and inspired to re-enter college. I have since enrolled and began taking classes on Monday, May 11th. Her willingness to "work with me" permitted me to have the money I needed to pay for my classes. For that I am extremely GRATEFULL!!

Ms. [REDACTED] I just want to say THANK YOU!! So very much, THANK YOU. With Warmest Regards, thank you!

Sincerely,

JUL 1 2009

Re: Mrs Melvin

To Whom It May Concern

I just wanted to say thank you for the excellent service and care I received from one of your fine representatives Mrs [REDACTED] helped me successfully rehabilitate my defaulted student loan. She was very courteous, helpful, and extremely positive during the embarrassing and frustrating task of dealing with one of my past mistakes

If all creditors treated their defaulted loans this way, I believe that the repayment status percentage would be highly increased

Also, thank you so much for working with me in this matter. You made it as painless and pleasurable as it could be in the circumstances!

Mrs [REDACTED] should be commended for her work and attitude

If you should have any questions or comments please call

Sincerely

JAN - 9 2008

Jan 08 08 03 PM '08

11/24/2008 15:09

Nov 24 2008 17:10g

PAGE 22/22

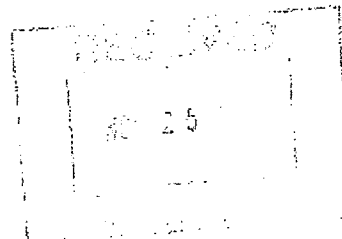
November 24, 2008

Dear Quality Control Department:

I submit this correspondence to draw your attention to the stellar service provided by Ms. Shayrah [REDACTED] of your [REDACTED] office. In recent weeks, I've spoken to Ms. [REDACTED] almost daily as we worked to construct a student loan repayment plan for a client I was representing on a *pro bono* basis. During each of our interactions, Ms. [REDACTED] was understanding, patient, respectful, and most importantly, helpful. Her professionalism was both greatly appreciated and made the task of addressing my client's needs a pleasant experience.

It's rare that I encounter service of a level that induces me to contact management. However, in this instance, I want to ensure that everyone at [REDACTED] understands and appreciates the fantastic work being done by Ms. [REDACTED].

Very truly yours,



Received
JAN-30-2008 WED 04:26 PM

Jan 30 2008 04:02 PM

P. 02

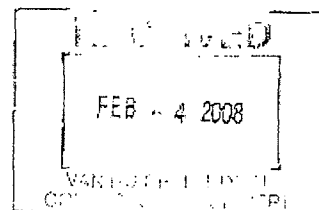
To: Van Rue

Date: January 30, 2008

Re: Penny

This memo is to commend the job of one of your customer service representatives, Ms. Penny [REDACTED]. I have dealt with many other people in regards to my student loans over the years. No one has come close to helping me get back on track the way that Penny has. Her kindness, perseverance, sense of humor, and professionalism is one of the biggest reasons that I have found a way to stay on course with my loan payments. You should be thankful to have someone so capable and personable working for your company. Thank you for the help Penny.

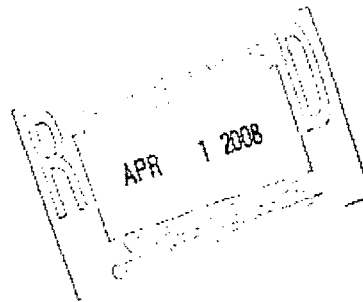
Sincerely,



March 27, 2008

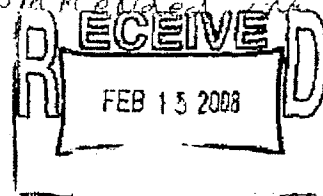
This letter is in reference to my representative Ms. [REDACTED]. Words cannot express how helpful and pleasant my experience with her has been. After 15 years of stress, trying figure out how I was going to rectify my situation, she offered a ray of hope. Due to different incidences, I was unable to imagine how I would possibly pay back the debt that I owed, not because I didn't want to, but because the amount had become overwhelming. She was patient, kind and understanding after dealing with so many others that were abrasive and hard to talk to about my circumstance. I applaud her for being so compassionate and supportive and I hope that in the future, I am able to be assisted by anyone as kind as she has been. Thank you, Ms. [REDACTED] for the opportunity and your generous assistance.

Sincerely,




2-9-08
TO Customer Service Dept

This is just a note to let you know that I really appreciate the help that I recieved from a MS. Faith [REDACTED]. She really helped me with my situation. IF it wasn't for her helping me the way that she did, I would be up against a rock and a hard place. She is to be recommended for her service.



THANKS,



January 22, 2008

To whom it may concern:

I'm writing this letter on behalf of Ms. [REDACTED]. Ms. [REDACTED] is the representative assigned to my student loan collections account. I attended VA Commonwealth University some years back and wasn't able to finish because of life situations and issues. I've made attempts to rectify the issues and payoff what I owe on my student loans, but never seemed to be able to grab hold and keep a steady income to keep the payments rolling in. I felt that if I called the agencies handling my account I would be made to feel belittled in some way by the collection companies. The Bible says to "owe no man." I want to be right and live by biblical principles. You have to follow the principles in order to receive the blessings.

Well, the Lord has placed an angel on the other line of the phone, the representative who handles my account for my student loans. A very knowledgeable person, who has a heart to help, and this angel is Ms. [REDACTED]. Ms. [REDACTED] by no means cuts corners for the company, she does her job to ensure that the money that is owed US Department of Education is paid. But she speaks to you in a way that is not demeaning. She really sounds like she wants to help by first getting the money the company is owed, but also by secondly, helping the other person on the line who owes the money understand the importance of paying the money and the best way for their circumstances to get it done in a way that every person benefits. SHE'S the Best Collections Agent I've ever had to deal with. And it makes me feel comfortable to call and say here's your money and feel that I can complete the task of paying it all back without the stress of having to deal with a rude person on the other end of the phone.

I said all of that to say this; Ms. [REDACTED] is a value to [REDACTED], please bless her with whatever acknowledgments, bonuses, days off, pay raises, just whatever incentives the company currently has or will have in the future. SHE DESERVES IT! SHE HAS A BEAUTIFUL SPIRIT!

Sincerely,

17 FEB 2008
JAN 23 2008

In everything give thanks!

JAN-09-2008 11:56

Received

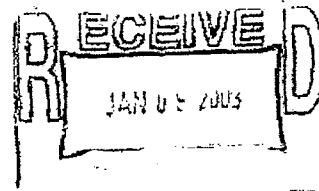
Jan 9 2008 10:53am

P.02

To whom it may concern

This is to let you know of the kindness of Mrs. [REDACTED] I know all too well of the monotony that comes along with customer service. One tends to forget that each customer is an individual. This was not the case with Mrs. [REDACTED]. She is a great asset to your company. She treated me as an individual and it was greatly appreciated. Please let her know that her kindness was valued with this customer, it wasn't so bad having to pay my monthly payments, and having every question I had answered. Please commend her

Thanks in advance



TOTAL P.02

December 29 2007

Letter of Appreciation

Dear representative

I am writing to express my thanks to representative who help in an attempt to resolve the defaulted loan problem and enabled me to consolidated into one account based on my income

She was so helpful to me as he went through all the items with me and explained them to me about the benefit and harms that will affect my loan status

I am wishing here good luck and successful administration in the future.

Furthermore, I look forward to find that the problem has been solved successfully, especially lifting my default status so that I can go back to schools and complete my rest of education and earn advanced degree of success.

Thank you in advance for your consideration.

Sincerely,

Enclosure

JAN 10 2008

January 03, 2008

To Whom it May Concern,

I'm writing you this letter to thank you for your patience and time with me concerning this defaulted student government loan. I had spoken with several of your agents but, was most impressed by [REDACTED] on the manner in which he handled this account for me. Upon receiving his call he took the time to answer and inform me of all my options available to me about this account, explaining to me in detail about the program and how it may best serve me. After speaking to him on the 31st of last month I, agreed to enter into the program and would like to express my gratitude for his services! I'm hoping to more people may experience the same courtesy and understanding that was given to me and these options that are available for them, are taken to help them as I can see that they will help me in my future endeavors.

Sincerely yours,

JAN - 4 2008

2008-01-03 16:01

Received

Jan 3 2008 02:51pm

W. d

TO Whom IT May Concern:

NORMA [REDACTED] Has Been Most Professional
Cordial during our frequent interaction
over the course of the last several weeks

She is Knowledgeable and patient - Truly
A pleasure to work with despite the difficult
nature of My situation

Ms [REDACTED] would Be an Asset to ANY
organization.

Sincerely,

a passion for cleanliness

March 27, 2008

To Whom It May Concern:

This letter is to give thanks to your company for allowing Mrs. [REDACTED] to be my representative as I traveled through this rehabilitation period with bringing my student loans current. It has been a tough time for me. However, Mrs. [REDACTED] has helped me every step of the way through this rehabilitation period. There were never any questions that went unanswered and she went above and beyond the call of duty to understand and assist me with the right payment to make sure that I was able to complete the agreement. She is such an asset to your company. She has really valued me as a customer and has really counseled me onto the right track of never defaulting on my student loans again. Mrs. [REDACTED] is really appreciated, and because of her assistance, I will be able to purchase a home for me and my daughter with good credit this summer. Again, I would like to say thank you!

Sincerely,

MAR 31 2008

To Whom It May Concern,

My name is
personal ID #

I am writing in regards to
the exceptional help I recieved from
my representative Norman ext.

I feel that Norman went above and beyond
what any regular phone/worker would
have gone. If it wasnt for Norman's
persistancy, my debt would not be taken
care of, but more important to me than
anything, now I can go back to college

I am glad to be able to finish getting
my degree, but I am absolutley greatful
that my two sons will now know that
their mother started, and now thanks to
Norman, can finish college.

I would truly & honestly like to
thank Norman for sticking with me
& not letting me slip through the cracks.

Though I have never meet him, Norman
will allways be greatly appericiated
and forever in my heart for being
so great to me in a time in my life
when I really needed someone like him to
push me in the right direction. Thankyou Very Much

RECEIVED

MAR 11 2010

ERICA, Thanks for
all your hardwork
and patience. I hope
you find happiness in
whatever you and may
the lord continue to
shower his blessings
on you. I appreciate
everything you did for
me.

if you appreciate, then you know

FEB 12 2009

26-Apr-09

To whom it may concern,

Please accept this letter of commendation for Renita [REDACTED] performance of her due diligence in assisting me with resolution of my defaulted student loans. From the very first day, Renita was committed to helping me resolve this issue. She was always considerate, professional, and very knowledgeable about her business. She was also very personable and I always understood exactly what she was trying to say. That is something special in this time of hurried, uncaring atmosphere of collections. I am so grateful to Renita for everything she did to facilitate the rehabilitation of my student loans. She has become a welcome voice on the other end of the phone. I think very highly of her skills in working with and for people. You are blessed to have someone so dedicated in service to her company and her clients. I am happy to report that everything happened just as Renita assured me it would. I have already received my income tax refund! And I am enrolled in University of Phoenix Online. I cannot thank you enough, Renita!

Sincerely,

I am writing this Letter in regard to Penny [REDACTED]. She was very helpful helping me to resolve the issues I had with my student loans that your office was assigned to collect.

Penny was very competent and extremely courteous in helping me understand the process. Penny was also very knowledgeable in how to resolve the issues I had. Most importantly to me was that she was very honest. In my personal opinion was that Penny should receive a raise or promotion or something because she was the best representative I talked to at

So on a rating system of 1 to 10 10 being the best & 1 being the worst, Penny receives a 10 from me. Thank you very much for helping me Penny!!

Signed

[REDACTED]

June 24, 2009

MS [REDACTED] -

Just a note to show my gratitude
for being most helpful, supportive and
VERY professional when I contacted
today.

Keep up the good work. I'm sure
any client that you come in contact
with will share the same heartfelt
experience as I have today.

JUL 1 2009

Always great full

April 7, 2010

Re: Eric [REDACTED]

To Whom It May Concern,

My name is [REDACTED] I reside at [REDACTED]

I was recently a client of your firm. I had several delinquent student loans which your firm helped me to successfully rehabilitate.

During the rehabilitation period, my case was handled by one of your employees, Mr. Eric [REDACTED]

Eric [REDACTED] was always congenial and professional in the execution of his duties. His customer service etiquette has always been flawless and he always worked diligently to accurately satisfy all my loan related questions.

Eric [REDACTED] is an excellent representative of your firm and I hope this letter assists him in bringing attention to his excellent work habits.

Thank you for your consideration regarding this matter and do feel free to contact me at any time.

Sincerely,

RECEIVED

APR 08 2010